

EXHIBIT 8

**REDACTED VERSION
OF DOCUMENT
SOUGHT TO BE SEALED**

From: [Jeff Nardinelli](#)
To: [Kaitlyn Murphy](#); [Maxwell Pritt](#)
Cc: [Shira Liu](#); ["John Cooper"](#)
Subject: RE: Waymo/Uber - Prod & Metadata Qs
Date: Thursday, August 17, 2017 8:27:57 AM

Plus John. John, this email is in reference to our agreement on yesterday's call to provide updates by 9 a.m. today.

Metadata. WAYMO-UBER-00004093 is indeed eight separate documents. Due to the exigencies of PI phase production, we produced them all as a single combined PDF. We will reproduce those eight documents in a standard production, with associated metadata. We already produced the native version of WAYMO-UBER-00004234 in PROD044.

Redactions. Yesterday our team finished analyzing the redacted documents. Several dozen of your requested de-redactions were for personal mailing addresses, emails, and phone numbers. You had told me that you analyzed the list of redacted documents that I had provided to you, "sorted through anything that looked like a cell number, SSN/tax ID, private address, etc.," and excluded those from your ask. On that representation I asked my team to examine every document you identified. Clearly your sort was ineffective. I'll take it as an honest mistake, but as I'm sure you understand, it's annoying to have my time wasted, but infuriating to realize I've asked my team to waste their time.

We removed redactions over names and compensation information, and will reproduce those documents. You also requested that we un-redact WAYMO-UBER-00026142, WAYMO-UBER-00023035, WAYMO-UBER-00012211, and WAYMO-UBER-00023035. We will do so, but did you goof in the fourth document you list? It's a duplicate.

Links. We will collect the documents linked by WAYMO-UBER-00031805, and produce them to the extent they are responsive to Uber's RFPs and have not already been produced. I note that since Ms. Murphy's August 12 email, we have produced 130 additional documents including some of the linked documents. For example, "2017 user milestones, territory, and vehicles" is at WAYMO-UBER-00044754; I didn't do a comprehensive analysis.

Thanks,
Jeff

From: Kaitlyn Murphy [mailto:kmurphy@BSFLLP.com]
Sent: Saturday, August 12, 2017 12:25 PM
To: Jeff Nardinelli <jeffnardinelli@quinnmanuel.com>; Maxwell Pritt <mpritt@BSFLLP.com>
Cc: Shira Liu <sliu@BSFLLP.com>
Subject: RE: Waymo/Uber - Prod & Metadata Qs

Hi Jeff,

I'm writing to follow up on the discussion below regarding metadata, linked documents, and redactions.

#1: Metadata. On 8/2, we asked if you would produce the metadata associated with WAYMO-UBER-

0004093, which appears to be several presentations appended together. You provided the metadata for one of them, but not the rest. We understand you had to locate the original documents again to produce them individually with metadata. Please let us know the status on producing the documents with metadata.

#2: Linked Documents. We also asked on 8/2 if Waymo would confirm that it had produced all of the documents linked in WAYMO-UBER-00031805. You indicated that some of the documents linked within -805 have been produced and would likely have been within Waymo productions volumes 7 or 25.

We've reviewed the documents in these two productions and have been unable to find many of the linked documents. For example, the descriptions for all of the linked documents in the "planning documents" table on -817 suggest they are relevant, yet we were unable to locate any of those documents in the production volumes you identified. The same is true for the following documents in the "Product/Business Reviews" table that spans pages -815 to -816: "2017 user milestones, territory, and vehicles," [REDACTED]

[REDACTED] We also searched for these three documents in the broader production and were not able to find them. The only similar documents we could locate were other documents that included hyperlinks to these presentations, but not the presentation itself. (See e.g. WAYMO-UBER-00039620, WAYMO-UBER-00039621, WAYMO-UBER-00039622, and WAYMO-UBER-00039623 all referencing same hyperlink to [REDACTED]) Please let us know if Waymo has produced these linked documents and if not, when they will be produced. We realize it might just be easier to re-produce WAYMO-UBER-00031805 with all linked documents; that's fine with us.

#3. Redactions. You agreed to re-produce documents without privacy redactions that had been applied to information other than things like social security numbers, account numbers, and residential addresses. We offered to identify which documents should be re-produced, and asked if you could provide a list of documents with privacy redactions, which you provided on 8/2. We reviewed those documents and provided a list of the bates numbers on 8/4. Please let us know when Waymo will re-produce these documents without redactions.

We've also identified a few other documents (not in the list you provided on 8/2) that we believe contain privacy redactions. Please also produce un-redacted versions of the following documents: WAYMO-UBER-00026142, WAYMO-UBER-00023035, WAYMO-UBER-00012211, and WAYMO-UBER-00023035.

Thank you,

Kaitlyn Murphy

Associate

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Suite 900

Oakland, CA 94612

(t) +1 510 874 1113

kmurphy@bsflp.com

www.bsflp.com

From: Jeff Nardinelli [<mailto:jeffnardinelli@quinnmanuel.com>]
Sent: Friday, August 04, 2017 3:01 PM
To: Maxwell Pritt
Cc: Shira Liu; Kaitlyn Murphy
Subject: RE: Waymo/Uber - Prod & Metadata Qs

Thanks Max. Looks like you've identified about 110 documents which will take some time to get through. If there are particular pressing documents, let us know and we can get to those more quickly.

On the metadata I've asked our team to look for the original eight documents and reproduce them with full metadata. The issue is that during the PI Phase, we were trying to rush a production to meet deadlines, so those documents were shared with me personally, and I downloaded them and produced them. They were then unshared with me. So now we have to locate the original documents, re-obtain permissions to view those documents, etc.

And I'll wait for your next word on the third issue.

From: Maxwell Pritt [<mailto:mpritt@BSFLP.com>]
Sent: Friday, August 04, 2017 1:45 PM
To: Jeff Nardinelli <jeffnardinelli@quinnmanuel.com>
Cc: Shira Liu <sliu@BSFLP.com>; Kaitlyn Murphy <kmurphy@BSFLP.com>
Subject: RE: Waymo/Uber - Prod & Metadata Qs

Hi Jeff,

Sorry I didn't get a chance to call yesterday. On the privacy redactions, we took a look at the text file you sent (thanks again) and sorted through anything that looked like a cell number, SSN/tax ID, private address, etc. We excluded those and ask that you reproduce the remaining documents below without privacy redactions (along with their metadata since it appears to have been stripped when redactions were applied).

On the metadata for the eight documents in the combined PDF at WAYMO-UBER-0004093, have you been able to locate any of the original documents yet? I understand you said it might take some time. You mentioned six of the eight documents are no longer shared with you—does that mean they're no longer shared with Waymo by Google/Alphabet, or something else? I wasn't clear on what the issue is.

We'll get back to you on the linked docs issue for WAYMO-UBER-00031805 (you sent us the production numbers you thought at least some of those docs might be in). I know Esther also sent an email about these linked docs (8/2 8:38pm) and Arturo asked for them at Mr. Krafcik's deposition. But honestly I can't recall if the request was discussed (or resolved even) on either of the 8/3 meet-and-confer calls.

Best,
Max

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From: Jeff Nardinelli [<mailto:jeffnardinelli@quinnmanuel.com>]
Sent: Wednesday, August 02, 2017 1:54 PM
To: Maxwell Pritt
Cc: Shira Liu; Kaitlyn Murphy
Subject: RE: Waymo/Uber - Prod & Metadata Qs

Ahh, I see, my bad. We served them as a combined PDF but it's actually eight different presentations. It'll be tough to find that metadata because I think six of the eight original documents

are no longer shared with us. This was a rapid-fire PI phase production.

We were able to run the report of all documents redacted for privacy. I've attached it as a notepad file just to save on email length.

From: Maxwell Pritt [<mailto:mpritt@BSFLP.com>]
Sent: Wednesday, August 02, 2017 12:23 PM
To: Jeff Nardinelli <jeffnardinelli@quinnmanuel.com>
Cc: Shira Liu <sliu@BSFLP.com>; Kaitlyn Murphy <kmurphy@BSFLP.com>
Subject: RE: Waymo/Uber - Prod & Metadata Qs

That's the title of the first presentation but it looks like a different one starts on page 16, and then there's several others.

From: Jeff Nardinelli [<mailto:jeffnardinelli@quinnmanuel.com>]
Sent: Wednesday, August 02, 2017 12:11 PM
To: Maxwell Pritt
Cc: Shira Liu; Kaitlyn Murphy
Subject: RE: Waymo/Uber - Prod & Metadata Qs

Each presentation? It's one document, called Chauffeur Marketing Plan 2016, right?

From: Maxwell Pritt [<mailto:mpritt@BSFLP.com>]
Sent: Wednesday, August 02, 2017 11:58 AM
To: Jeff Nardinelli <jeffnardinelli@quinnmanuel.com>
Cc: Shira Liu <sliu@BSFLP.com>; Kaitlyn Murphy <kmurphy@BSFLP.com>
Subject: RE: Waymo/Uber - Prod & Metadata Qs

Thanks very much, Jeff. Appreciate the quick answer for -4093 and understand the metadata will take more time. Does that mean Meiling Tan created each presentation in the document or just the compilation that is -4093? If it's the latter, we'd request the metadata for each presentation. Also appreciate the quick response on -31805, and we'll look through PROD007 and 025. We've requested (I believe at Mr. Krafcik's deposition today) all of the linked documents in -31805, so if you can let us know if you'll produce any linked documents that weren't already produced, I'd appreciate it. I understand it might take a little time to get an answer.

Best,
Max

From: Jeff Nardinelli [<mailto:jeffnardinelli@quinnmanuel.com>]
Sent: Wednesday, August 02, 2017 11:26 AM
To: Maxwell Pritt
Cc: Shira Liu; Kaitlyn Murphy
Subject: RE: Waymo/Uber - Prod & Metadata Qs

I'm quite happy with this approach.

Let me give you one answer quickly, for WAYMO-UBER-0004093, Meiling Tan created that doc on April 5, 2016, and last edited it on January 13, 2017. We can produce the metadata but that will take time, and I want you to have that info for her depo tomorrow. I pulled it from looking directly at the original document's revision history on Google Drive.

We do not as a matter of course produce every document linked from every produced document. We have produced some documents linked within WAYMO-UBER-00031805 because those documents were responsive to RFPs including RFP 93. Those would be mostly within PROD007 and PROD025.

I've reached out to the team on whether we can bulk identify redacted documents.

Jeff

From: Maxwell Pritt [<mailto:mpritt@BSFLLP.com>]
Sent: Wednesday, August 02, 2017 11:14 AM
To: Jeff Nardinelli <jeffnardinelli@quinnmanuel.com>
Cc: Shira Liu <sliu@BSFLLP.com>; Kaitlyn Murphy <kmurphy@BSFLLP.com>
Subject: Waymo/Uber - Prod & Metadata Qs

Hi Jeff,

I'm emailing separately about some production and metadata issues we've identified. It doesn't seem like we need to include the Special Master and other counsel on these emails unless and until we reach a disagreement, but let me know if you disagree. (The Special Master said on this morning's meet-and-confer that he agreed with this approach.) Let me know if there's others at Quinn I should include on these emails.

Privacy redactions: Our vendor confirmed we can't identify documents with privacy redactions (except by manual review) because information about whether a document has a privacy redaction isn't something that was provided in the production load file or with specific redaction text that we can OCR and search ourselves. Please let us know if your vendor can identify the documents with privacy redactions and, if so, either re-produce without redactions (if there aren't also redactions for things like phone numbers, etc.) or send us the list of bates numbers and we'll try go through them to identify documents we'd like to have reproduced. I mentioned three documents in my other email this morning which we'd like reproduced for now.

Metadata: We didn't receive metadata for WAYMO-UBER-0004093. Can you please produce the metadata?

Linked docs: We've identified some documents that link other documents, like WAYMO-UBER-00031805. Can you confirm that where a documents links to other documents, the linked documents were produced (and in the same production)? We haven't been able to locate documents linked in -00031805. If you have or can easily identify the bates numbers for these linked documents, we'd appreciate them, especially because a number of the links are just

descriptive (rather than the actual name of the document). If you don't have the bates numbers or can't identify them, please let us know what production they were in.

Thank you!

Best,
Max

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